

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA**

GLENN A. PORTER,

Plaintiff,

v.

JOE ALLBAUGH, *et al.*,

Defendant.

**Case No.: 18-CV-472-JED-FHM**

**DEFENDANT' MOTION FOR EXTENSION OF TIME  
TO FILE SPECIAL REPORT AND RESPONSIVE PLEADING**

Defendants Joe Allbaugh, Janet Dowling, Greg Williams, Bethany Wagener, Patricia Jones, Joel McCurdy and Michelle Lehnus respectfully request this Court grant an extension to twenty-one (21) days from December 17, 2018 until January 7, 2019 to file their responsive pleading. In support of said Motion, Defendants state:

1. Plaintiff filed the Petition on September 10, 2018, in the Northern District Court of Oklahoma. [Doc. 1].
2. On October 5, 2018, this Court Ordered a Special Report. [Doc. 7].
3. Defendant was not served until October 17, 2018.
4. Defendant's responsive pleading is due to be filed December 17, 2018, pursuant to Fed. R. Civ. P. 81(c).
5. Due to unanticipated impediments, the undersigned is in need of additional time to conduct the appropriate and necessary analysis of the numerous facts and legal issues presented in this matter in order to properly prepare a responsive pleading and Special Report on behalf of Defendants.

6. Therefore, Defendants request an extension of twenty-one (21) days, until January 7, 2019, in which to file Defendants' responsive pleading and Special Report.

7. Plaintiff is incarcerated in the Dick Conner Correctional Center. Due to the complications of communicating with Plaintiff and the immediate need to file this motion, the undersigned has not attempted to contact Plaintiff to determine if he would object to this motion.

8. Defendants have requested an extension for a responsive pleadings in this matter. Defendants request this extension in good faith and not for the purposes of delay. The Court has not entered a scheduling order in this matter, and no other deadlines shall be affected if this motion is granted.

### **CONCLUSION**

WHEREFORE, Defendants respectfully request a twenty-one (21) day extension, until January 7, 2019, in which to file Defendants' responsive pleading and Special Report.

Respectfully submitted,

/s/Jacqueline R. Zamarripa

**JACQUELINE R. ZAMARRIPA,**

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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of December 2018, I electronically transmitted the attached document to the Clerk of the Court using the ECF system for filing and transmittal by U.S. Mail to the following person who is not an ECF registrant

Glenn A. Porter, DOC # 99595  
Dick Conner Correctional Center  
129 Conner Road  
Hominy, OK 74035  
*Plaintiff pro se*

/s/Jacqueline R. Zamarripa  
Jacqueline R. Zamarripa